

United States Bankruptcy Court

District Of MASSACHUSETTS

In re John V. LaMagna
Debtor

Case No. 16-13568

Chapter 13

John V. LaMagna
Plaintiff

v.

Adv. Proc. No.

Federal National Mortgage Association
aka FNMA, aka Fannie Mae
Defendant

COMPLAINT AND REQUEST FOR INJUNCTION

I. The Parties to This Complaint

A. The Plaintiff(s)

Name
Street Address
City and County
State and Zip Code
Telephone Number
E-mail AddressJane M. Doe, residing since 2009 at
841 Santuit Newtown Rd.
Marstons Mills, Barnstable County
Massachusetts, 02648
508 420-1846

B. The Defendant(s)

Defendant No. 1

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)Orlans Moran PLLC
foreclosure firm
465 Waverly Oaks Rd. suite 401
Waltham, Middlesex County
Massachusetts, 02452
781 790-7800
bankruptcy@orlansmoran.com

Defendant No. 2

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)Orlans Moran PLLC
foreclosure firm
1650 W. Big Beaver Rd.
Troy, Oakland County
Michigan, 48084
248 502-1400US BANKRUPTCY COURT
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COMPLAINT AND REQUEST FOR INJUNCTION**Defendant No. 3**

Name	Julie Taylor Moran
Job or Title (if known)	co-owner Orlans Moran
Street Address	465 Waverly Oaks Rd. suite 401
City and County	Waltham, Middlesex County
State and Zip Code	Massachusetts, 02452
Telephone Number	781 790-7800
E-mail Address (if known)	bankruptcy@orlansmoran.com

Defendant No. 4

Name	Linda Marie Orlans
Job or Title (if known)	co-owner Orlans Moran
Street Address	1650 W. Big Beaver Rd.
City and County	Troy, Oakland County
State and Zip Code	Michigan, 48084
Telephone Number	248 502-1400
E-mail Address (if known)	bankruptcy@orlansmoran.com

Defendant No. 5

Name	Stephanie Babin
Job or Title (if known)	foreclosure lawyer @ Orlans Moran
Street Address	465 Waverly Oaks Rd. suite 401
City and County	Waltham, Middlesex County
State and Zip Code	Massachusetts, 02452
Telephone Number	781 790-7800
E-mail Address (if known)	

Defendant No. 6

Name	Federal National Mortgage Association
Job or Title (if known)	
Street Address	3900 Wisconsin Ave. NW
City and County	Washington D.C.
State and Zip Code	20016
Telephone Number	
E-mail Address (if known)	

Defendant No. 7

Name	
Job or Title (if known)	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address (if known)	

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COMPLAINT AND REQUEST FOR INFORMATION**II. Statement of Claim**

12/1/14 "FORECLOSURE" @ 841 SANTUIT NEWTOWN RD., MARSTONS MILLS, MA. 02648, BY FORECLOSURE SALE, AND BY QUIET ENTRY, IS FRAUD

1. Fannie Mae/Orlans Moran, and its' attorneys, asserted as their right to file a fraudulent motion for relief from stay on 10/27/16, Fannie Mae's "ownership", when they do not lawfully own it, as the foreclosure is fraud.
2. As the motion was fraudulent, and filed without the right they assert, it was a violation of ch. 13 stay, and it was not Fannie Mae's/Orlans Moran's only violation of the stay, along with numerous 93A violations.
3. Fannie Mae/Orlans Moran and it's attorneys, knowingly, willfully and intentionally inflicted emotional distress and caused grievous harm to the elderly, disabled debtor and the elderly, disabled, at risk third party, by their outrageous acts, when Fannie Mae/Orlans Moran and it's attorneys knew they were elderly and disabled and at risk.

III. Relief

1. Prohibit Fannie Mae/Orlans Moran and it's attorneys, or any agents or party acting on their behalf, to do or attempt to do any of the following, pending the determination of void foreclosure:
 - A.) Prohibit any sale or conveyance of the property, whatsoever, to any party.
 - B.) Prohibit any contact, by any means whatsoever, with any party at, or with any interest in, since 2009, 841 Santuit Newtown Rd Marstons Mills, MA.
 - C.) Prohibit transferring of any utility to Fannie Mae or any other name, and any interference, interruption, or disruption of any utilities, mail, or any other services at 841 Santuit Newtown Rd. Marstons Mills, MA.
 - D.) Any other relief court and/or jury determines, as good cause found.
2. Compel Discovery: records, documents, interrogatories. Order Fannie Mae/Orlans Moran, and it's attorneys, to comply with Plaintiff's Discovery request, as well as any other parties with relevant records, documents or information.

☒ Check if a jury trial is demanded in complaint

☒ Check if this is asserted to be a class action under FRCP 23

Demand \$ As determined by court and/or jury, plus legal fees, as good cause found.

Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery

Date of signing: 12/15/16

Signature of Plaintiff

Printed Name of Plaintiff

John V. LaMagna

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